

**IN THE UNITED STATES BANKRUPTCY COURT  
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
William Brandon Alonzo	:	Case No: 1-18-bk-03389-RNO
Debtor,	:	
	:	Chapter 7
	:	
Toyota Motor Credit Corporation	:	11 U.S.C. 362
Movant	:	
	:	
v.	:	
	:	
William Brandon Alonzo	:	
Debtor,	:	
	:	
Lawrence G. Frank	:	
Trustee	:	

**DEBTOR'S ANSWER TO MOVANT'S MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY**

AND NOW COMES, Debtor, William Brandon Alonzo, by and through his attorneys, Jacobson, Julius, & Harshberger, and hereby file this Answer to Movant's Motion for Relief From the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.

10. Admitted.

11. Admitted.

12. Paragraph 12 of Movant's motion is a conclusion of law to which no response is required. By way of additional response, Debtor's son is a co-obligor on said debt and is hopeful that the Movant would be willing to entertain and discuss making Moving current.

13. Paragraph 13 of Movant's motion is a conclusion of law to which no response is required.

**WHEREFORE**, Debtors respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS & HARSHBERGER

Dated: November 7, 2018

s/Chad J. Julius

ID# 209496

8150 Derry Street

Harrisburg, PA 17111.5260

717.909.5858

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Debtor,	:	
	:	
Lawrence G. Frank	:	
Trustee	:	

**CERTIFICATE OF SERVICE**

I, Colleen, paralegal with Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within Respondent's Answer to Movant's Motion For Relief From The Automatic Stay upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

**ECF/CM:**

Lawrence G. Frank (Trustee)	James C. Warmbrodt, Esquire KML Law Group, P.C. Suite 5000- BNY Independence Center 701 Market Street Philadelphia, PA 19106-1532
U.S. Trustee 601 Walnut Street, Ste. 950 West Philadelphia, PA 19106	

s/Colleen Reed  
 Colleen Reed, Paralegal  
 Jacobson, Julius & Harshberger  
 8150 Derry Street  
 Harrisburg, PA 17111  
 717.909.5858  
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Dated: November 7, 2018